Appl. No. 10/518,253   Page 6 of 9
Amendment and/or Response
Reply to Office action of 24 September 2007

REMARKS / DISCUSSION OF ISSUES

Claims 1-9 are pending in the application.

The applicant thanks the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority documents, and for determining that the drawings are acceptable.

The abstract is rewritten to conform to U.S. patent practice.

Claims are amended for non-statutory reasons: to correct one or more informalities, remove figure label numbers, and/or to replace European-style claim phraseology and spelling with American-style claim language. The claims are not narrowed in scope and no new matter is added.

The Office action objects to the terms "intended to", "suitable for", and "substantially larger". The terms "intended" and "suitable" have been deleted from the claims; the claims are not narrowed in scope and no new matter is added.

The courts have consistently held that the term "substantially" does not render a claim indefinite:

> "the term 'substantially' is a descriptive term commonly used in patent claims
> to 'avoid a strict numerical boundary to the specified parameter," Verve, LLC
> v. Crane Cams, Inc., 311 F.3d 1116, 1120 (Fed. Cir. 2002).
> "The term 'substantial' is a meaningful modifier implying 'approximate,'
> rather than 'perfect.'" Liquid Dynamics, 355 F.3d at 1368.
> In Cordis Corp. v. Medtronic AVE, Inc., 339 F.3d 1352, 1361 (Fed. Cir.
> 2003), the court refused to impose a precise numeric constraint on the
> term "substantially uniform thickness," noting that the proper interpretation
> of this term was "of largely or approximately uniform thickness" unless
> something in the prosecution history imposed the "clear and
> unmistakable disclaimer" needed for narrowing beyond this plain-
> language interpretation. Id. Moreover, in Anchor Wall Sys. v. Rockwood
> Retaining Walls, Inc., 340 F.3d 1298 (Fed. Cir. 2003), the court held that
> "the phrase 'generally parallel' envisions some amount of deviation from
> exactly parallel," and that "words of approximation, such as 'generally' and
> 'substantially,' are descriptive terms 'commonly used in patent claims' to
> avoid a strict numerical boundary to the specified parameter.'" Id. at
> 1311.

Appl. No. 10/518,253   Page 7 of 9
Amendment and/or Response
Reply to Office action of 24 September 2007

The Office action rejects claims 1, 5, and 6 under 35 U.S.C. 112, second paragraph, for use of the term 'card'. In the interest of advancing prosecution in this case, the term 'card' has been replaced by the term 'set'. The applicant notes that no new matter is added, and the scope of the claims is unchanged, because the term 'card' is sometimes used to refer to a 'collection', the origin being associated with the device used to card (bundle) fibers prior to spinning.

The Office action rejects claim 9 under 35 U.S.C. 101 for failing to recite a computer-readable medium; claim 9 is correspondingly amended herein.

The Office action rejects claims 1-6 under 35 U.S.C. 103(a) over Lee (USP 6,259,823) and Nio et al. (USP 6,795,588, hereinafter Nio). The applicant respectfully traverses this rejection.

Claim 1, upon which claims 2-9 depend, claims a method for detecting a grid corresponding to blocking artifacts that includes high-pass filtering a portion of a digital image to supply a set of discontinuity pixels, detecting blocking artifacts from the set, and searching rows within the portion for a grid row having a density of blocking artifacts that is substantially larger than that of its neighboring rows.

The combination of Lee and Nio fails to teach detecting a grid of blocking artifacts by searching a set of grid rows within a portion of a digital image for a grid row having a density of blocking artifacts that is substantially larger than that of its neighboring rows.

The Office action asserts that Lee provides this teaching at "Figure 1, numeral 112, specifically numeral 116". The applicant respectfully disagrees with this assertion.

Appl. No. 10/518,253   Page 8 of 9
Amendment and/or Response
Reply to Office action of 24 September 2007

Lee's gradient operation unit 112 is a high-pass filter that calculates the gradient of each pixel, and Lee's local edge map generator 116 is one of two edge detectors that identifies whether a pixel lies on an edge based on the magnitude of the gradients of the pixel. If either of the two edge detectors 114, 116 identify the pixel as lying on an edge, a weighted average filter 156 is applied to generate the corresponding output pixel value, otherwise, a non-weighted average filter 154 is applied.

Lee does not detect a grid corresponding to blocking artifacts, and specifically does not search for corresponding grid rows, and does not identify such grid rows by comparing the density of blocking artifacts in the rows. Accordingly, the applicant respectfully requests that the rejection of claims 1-6 under 35 U.S.C. 103(a) over Lee and Nio be withdrawn.

The Office action rejects claims 6-8 under 35 U.S.C. 103(a) over Lee, Nio, and Inoue (USP 6,172,770). The applicant respectfully traverses this rejection.

Each of these claims are dependent upon claim 1, and in this rejection, the Office action relies upon Lee and Nio for teaching the elements of claim 1. As noted above, the combination of Lee and Nio fails to teach the elements of claim 1. Accordingly, the applicant respectfully requests that the rejection of claims 6-8 under 35 U.S.C. 103(a) that relies on Lee and Nio for this teaching be withdrawn.

Appl. No. 10/518,253   **Page 9 of 9**
Amendment and/or Response
Reply to Office action of **24 September 2007**

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

/Robert M. McDermott/
Robert M. McDermott, Esq.   **Please direct all correspondence to:**
Registration Number 41,508   Larry Liberchuk, Esq.
Phone: 804-493-0707   Philips Intellectual Property and Standards
Fax: 215-243-7525   P.O. Box 3001
                                     Briarcliff Manor, NY 10510-8001
                                     Phone: (914) 333-9618
                                     Fax: (914) 332-0615